REMARKS/ARGUMENTS

This Amendment is in response to the Final Office Action mailed September 23, 2005.

Claims 4-96 were pending in the present application. The present response amends claims 4, 12,

14, 27, 34, 41, 53, 59, 64, 75, 94, 95, and 96; and cancels claims 8-11, 13, 46-52, 70-74, and 79,

leaving pending in the application claims 4-7, 12, 14-45, 53-69, 75-78, and 80-96.

Reconsideration of the rejected claims is respectfully requested.

I.   Objection to the Affidavit

The affidavit filed on October 19, 2005 was determined to be ineffective to overcome the

ResQNet reference. Although Applicants do not necessarily agree with this conclusion,

Applicants believe that the claims sufficiently distinguish the embodiments of the present

invention from the ResQNet reference, for reasons including those below, such that an affidavit

is not necessary. Applicants reserve the right to file a similar affidavit at a later time during

prosecution, however, if deemed necessary.

II.   Rejection under 35 U.S.C. §102

Claims 4-12, 53-57, 59-62, 64-67, and 69 are rejected under 35 U.S.C. §102(b) as being

anticipated by *D'Arlach* (US 6,026,433). Applicants respectfully submit that *D'Arlach* does not

disclose or suggest all limitations recited in these claims.

For example, Applicants' claim 4 recites a system for developing an application user

interface, including:

> an integrated development environment configured for a developer to specify a user
> interface element in the application user interface, the user interface element having a user
> customizable property, the application user interface being configured as an interface between an
> internet application and a user;
> an application designer configured to produce metadata characterizing the customizable
> property;
> a data repository including a data record associated with the customizable property, **the
> data record being modifiable by a user** of the internet application and accessible using the
> metadata; and
> **a user interface generator configured to generate the application user interface in
> response to a request from a user, the user interface generator configured to use the data
> record to determine a current state of the user customizable property at substantially the**

**time of the request and generate markup language including the current state of the user
customizable property for the user interface element**

(*emphasis added*). Such limitations are not disclosed by *D'Arlach*.

D'Arlach, a reference dating back to 1997, discloses the use of a plurality of customizable

templates that allow a user to easily create and maintain a Web site "without requiring

knowledge of HTML," allowing the user to author a Web site from a client computer (col. 2,

lines 30-49). A customizable template contains customizable objects or elements such as buttons

and text labels, which in turn have attributes or properties associated therewith (col. 4, lines 59-

67). A user can create a Web site by selecting various elements and attributes associated with a

selected template (col. 5, lines 54-65). After creating or editing the site, the site is published

(col. 6, lines 44-46). "Publishing" the site means that a directory is generated in the server and

the associated files (including HTML files) are "generated" and stored in the directory, which

can be used to serve subsequent user requests (col. 6, lines 54-60). The creation of Web pages

using templates and the generation of HTML through publishing is well known in the art. For

each user to have a customized site, each user must pull up the templates, modify the elements

and attributes, and then publish the site to a directory. Each user will have a unique set of

HTML documents generated at the time of publishing, and anyone accessing that user's site in

the future will receive those HTML documents.

This is very different that what is recited in Applicants' pending claims. Applicants'

disclosure is directed to a user-customizable interface to a Web based application, for example.

A user can personalize options and functionality to be presented in the interface, and data for the

personalization is stored in a database. A unique set of HTML documents is not generated for

each customized user, as in *D'Arlach*. When the user subsequently submits a request, a "user

interface generation engine," for example, will "access the saved configuration and

personalization data and default page information" and generate "markup-language data, such as

HTML data, suitable for presentation as a Web page" (paragraph [0046]). Therefore, a unique

set of HTML documents is generated in response to the request from the user, such that each user

can receive a customized interface without having to generate and store separate pages for each user as in *D'Arlach*.

As discussed above, Applicants' claim 4 recites "a data repository including a data record associated with the customizable property, the data record being modifiable by a user." *D'Arlach* does not disclose such a limitation, as *D'Arlach* instead requires a new HTML page to be generated ("published") in order to modify an element or attribute of the page. *D'Arlach* does not simply allow for the updating of a data record storing an attribute to be used for the page.

Applicants' claim 4 also recites a user interface generator "configured to generate the application user interface in response to a request from a user" and "to use the data record to determine a current state of the user customizable property at substantially the time of the request and generate markup language including the current state of the user customizable property." *D'Arlach* does not disclose or suggest such a limitation, as *D'Arlach* instead generates specific HTML files for each user before any requests are served.

As *D'Arlach* does not teach or suggest all limitations of claim 4, *D'Arlach* cannot anticipate claim 4 or dependent claims 5-12. Independent claims 53, 59, and 64 recite similar limitations that also are not disclosed or suggested by *D'Arlach*, such that claims 53, 59, and 64, and dependent claims 54-57, 60-62, 65-67, and 69 are not anticipated by *D'Arlach*.

Applicants therefore respectfully request that the rejection with respect to claims 4-12, 53-57, 59-62, 64-67, and 69 be withdrawn.

II.   Rejection under 35 U.S.C. §103

(a) *D'Arlach* and ResQNet

Claims 13, 14, 17, 18, 20, 22-35, 37, 42, 44-47, 49-52, 63, 68, 70, 72-76, 79, 80, 82-85, 87-91, and 93-96 are rejected under 35 U.S.C. §103(a) as being obvious over *D'Arlach* in view of ResQNet (ResQNet.com Announces the Release of ResQNet Version 3.2). These claims contain limitations that are neither taught nor suggested by *D'Arlach* as discussed above, such that *D'Arlach* cannot render these claims obvious. ResQNet does not make up for the deficiencies in *D'Arlach* with respect to these claims.

ResQNet is cited as teaching a customizable tab order (OA pp. 11, 12, 13-14, 15, 17, 18, etc.) ResQNet discloses a thin Java applet available as both a standalone application and as an ad-on, which provides a tab-order re-sequencing function. ResQNet does not teach or suggest how the tab-reordering is done, or that properties are stored in a remote location for subsequent HTML generation in response to a user request. ResQNet also fails to teach or suggest a user interface generator configured to generate the application user interface in response to a request from a user, using the data record to determine a current state of the user customizable property at substantially the time of the request and generate markup language including the current state of the user customizable property. As such, claims 13, 14, 17, 18, 20, 22-35, 37, 42, 44-47, 49-52, 63, 68, 70, 72-76, 79, 80, 82-85, 87-91, and 93-96 cannot be rendered obvious by *D'Arlach* and ResQNet, either alone or in combination.

(b) *D'Arlach*, ResQNet, and *Castro*

Claims 15, 16, 36, 71, 77, 81, 86, and 92 are rejected under 35 U.S.C. §103(a) as being obvious over *D'Arlach* in view of ResQNet and further in view of *Castro* ("Castro", "HTML for the World Wide Web with XHTML and CSS: Visual QuickStart Guide, Fifth Edition"). These claims contain limitations that are neither taught nor suggested by *D'Arlach* and ResQNet as discussed above, such that *D'Arlach* and ResQNet cannot render these claims obvious. *Castro* does not make up for the deficiencies in *D'Arlach* and ResQNet with respect to these claims.

Castro is cited as teaching a system "wherein the customizable tab-order property includes tab-over" (OA p. 27). Chapter 7 of Castro, as cited in the Office Action, refers to linking and HTML programming for Web pages. *Castro* does not teach or suggest how to effect dynamic tab-reordering, or use of properties stored in a remote location for subsequent HTML generation in response to a user request. *Castro* also fails to teach or suggest a user interface generator configured to generate an application user interface in response to a request from a user, using a data record to determine a current state of the user customizable property at substantially the time of the request and generate markup language including the current state of the user customizable property. As such, *Castro* cannot render these claims obvious, either alone or in combination with *D'Arlach* and ResQNet.

(c) *D'Arlach*, ResQNet, and *Carter*

Claims 19, 48, and 78 are rejected under 35 U.S.C. §103(a) as being obvious over *D'Arlach* in view of ResQNet and further in view of *Carter* (US 6,549,199). These claims contain limitations that are neither taught nor suggested by *D'Arlach* and ResQNet as discussed above, such that *D'Arlach* and ResQNet cannot render these claims obvious. *Carter* does not make up for the deficiencies in *D'Arlach* and ResQNet with respect to these claims.

Carter is cited as teaching that "the customizable tab-order property is configurable according to a class of user interface elements" (OA p. 28). Such teaching still would not make up for the deficiencies in *D'Arlach* and ResQNet with respect to these claim, as *Carter* fails to teach or suggest a user interface generator configured to generate an application user interface in response to a request from a user, using a data record to determine a current state of the user customizable property at substantially the time of the request and generate markup language including the current state of the user customizable property. As such, *Carter* cannot render these claims obvious, either alone or in combination with *D'Arlach* and ResQNet.

(d) *D'Arlach*, ResQNet, and *Dutta*

Claims 21 and 43 are rejected under 35 U.S.C. §103(a) as being obvious over *D'Arlach* in view of ResQNet and further in view of *Dutta* (US 2002/0097264). These claims contain limitations that are neither taught nor suggested by *D'Arlach* and ResQNet as discussed above, such that *D'Arlach* and ResQNet cannot render these claims obvious. *Dutta* does not make up for the deficiencies in *D'Arlach* and ResQNet with respect to these claims.

Dutta is cited as teaching a system wherein "the customizable tab-order property is configurable according to the identity of a client" (OA p. 28). Applicants respectfully submit that *Dutta* is directed to changing temporal parameters in interfaces presented to persons such as a disabled or "handicapped person," including temporal parameters such as HTTP refresh rate, banner scroll rate, and animated gif timing, and does not teach or suggest anything relating to customizable tab-order priority (paragraphs [0002]-[0004], [0049]). Further, *Dutta* fails to teach or suggest a user interface generator configured to generate an application user interface in response to a request from a user, using a data record to determine a current state of the user

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customizable property at substantially the time of the request and generate markup language including the current state of the user customizable property. As such, *Dutta* cannot render these claims obvious, either alone or in combination with *D'Arlach* and ResQNet.

Applicants therefore respectfully request that the rejections with respect to these claims be withdrawn.
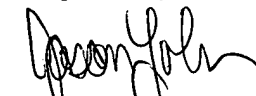
VI.   Amendment to the Claims

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,

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Jason D. Lohr
Reg. No. 48,163

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 415-576-0200
Fax: 415-576-0300
JDL:ldr
60624296 v1

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